

Message

From: Thompson, Lisa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C4FE265551504398A47A9049EBA0AA13-THOMPSON, L]
Sent: 10/4/2018 9:25:44 PM
To: Hambrick, Amy [Hambrick.Amy@epa.gov]
Subject: RE: Confirmed + more Materials: Meeting with Theresa Pugh Consulting, LLC on OOOOa and ACE
Attachments: Meeting with U.S. EPA and Theresa Pugh Consulting LLC. September 25, 2018.pdf

Hi Amy –

Since this meeting covered both ACE and OOOOa, I went ahead and created a summary of the meeting, and addressed it to both dockets. I've taken the liberty of uploading this to your Oil and Gas docket as well (2017-0483). I left it in draft form so you had a chance to review: EPA-HQ-OAR-2017-0483-DRAFT-0132. If this works for you, go ahead and change it to meta data ready 😊

I think these should actually both be in the Final Rule sequence in the docket, but I haven't created one yet for the ACE docket, so I put them in the latest Proposed Rule phase. It's all the same on regs.gov ...

Attached for your review, and the 8 attachments have been uploaded to FDMS.

Miss working with you!!

-----Original Appointment-----

From: Hambrick, Amy
Sent: Tuesday, September 25, 2018 9:43 AM
To: Swanson, Nicholas; Witt, Jon; Witosky, Matthew; Marsh, Karen; Garwood, Gerri; Hoffmann, Jucilene; Miller, Elizabeth; Macpherson, Alex; Mia, Marcia; Waltzer, Suzanne; DeFigueiredo, Mark; Weitz, Melissa; Alsalam, Jameel; Fruh, Steve; Hutson, Nick; Thompson, Lisa; Woods, Clint; Koerber, Mike; Cozzie, David; Santiago, Juan
Cc: Eisele, Adam; Fellner, Christian; Culligan, Kevin; Keaveny, Brian
Subject: Confirmed + more Materials: Meeting with Theresa Pugh Consulting, LLC on OOOOa and ACE
When: Tuesday, September 25, 2018 10:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: RTP-Line-541-1958/Phone-Line/RTP-Conf-Bridge; RTP-C300A-Max40/RTP-Bldg-C

+ additional materials.

UPDATED:

Hi Amy: Here are the handouts/slides for your EPA staff for our call tomorrow. The slides are in PowerPoint but can be printed out as "paper slides". We hope that the ACE team and OOOOa teams will stay on the conference call for the entire call as the issues in two rulemakings are linked.

Dial in: Ex. 6 Personal Privacy (PP)
No passcode

Agenda:

10:30 Self introductions

- EPA staff

- Theresa Pugh, Theresa Pugh Consulting, LLC: brief explanation as to why the two rules are connected for dual fuel (oil and biomass), remaining useful life of plant, efficiency decisions, and methane leaks
- Dave Fraley, MMUA (PE, PhD)
- Carrie Annand, Biomass Power Association

Listening by phone if available: Bob Cleaves, President, Biomass Power Association, Portland, OR & Mike Siefert (Missouri public power utilities)

Presentations:

10 minutes **Dave Fraley:** ACE (He has had computer problems today and will send paper later today—his router died).

10 minutes **Carrie Annand:** ACE and why biomass as compliance options matters (PowerPoint Biomass & Carbon) (Two additional papers are offered for background).

15 minutes **Theresa Pugh:** ACE and OOOOa and why the two rules will be connected (highlights: need for dual fuel permitting, methane leak repair time for compressor stations and pipelines serving power plants using **NERC study**) PowerPoint slides (paper slides) “EPA ACE 0000a Sept 2018 slides FINAL

11:30-12:00 ET Time for Q and A or discussion of follow up

Thank you,

Theresa
Theresa Pugh Consulting, LLC
2313 North Tracy Street
Alexandria, VA 22311
703-507-6843
www.theresapughconsulting.com

All- Nick S. and I received a meeting request from Theresa Pugh to discuss the interface of OOOOa and ACE (details below). I am casting a wide net for the oil and gas team (forward to anyone I missed) with the understanding that not everyone may be interested in attending but regardless I wanted to make sure everyone was aware. Nick S., as we

discussed, I'll leave it to you and Nick H. to forward this invite to any additional team members on your end. Including Lisa because I am sure Theresa will be submitting a comment letter to ACE docket. Note below and attached background of the oil and gas team's meeting with Theresa last year. FYI – I don't think the meeting will take more than 1 hour, but scheduling a little more time just in case and also for phone line/room logistics. Let me know if you have any questions.

Discussion Topic:

- natural gas issues that are relevant for NSPS 111(d) (new ACE proposed rule) and the EPA's next steps on section OOOOa on methane for new (or existing) pipelines and compressor stations (T/S segment) serving power sector and LDCs.
- issues relevant to the "remaining useful life of the plant" and NERC's Nov 2017 study. I served on a NERC study in the last year as an unpaid advisor on natural gas issues. There are 23 areas in the US where more than one gas-fired power plants are served by only one pipeline with no redundancy in transmission pipelines or the underground gas storage. That places some risk for force majeure for power plants.
- The link to the NERC study is
https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SPOD_11142017_Final.pdf

From: Theresa Pugh [<mailto:Pugh@theresapughconsulting.com>]

Sent: Thursday, August 23, 2018 6:07 PM

To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>

Subject: Request for appointment: September 17 or 18 (or 19) in Raleigh re EPA-HQ-OAR-2017-0355

Dear Ms Rakosnik:

Bill gave me your e mail

address. (I know him or would not refer to him with his first name). He seemed interested to learn more about the cross-cutting issues between the two rulemakings.

If you scroll down to see other e mail correspondence, I would like to coordinate a meeting with the staff at headquarters and RTP working on BOTH the proposed ACE rulemaking and the upcoming methane OOOOa reconsideration on new sources (or preparations for existing source rule) for gas compressors and pipelines. (I believe Amy is the lead on that project).

Below you will see my reach out to Amy H and Nick S to see if they are available on Sept 17 (after 2) or on Sept 18-19 in RTP. If that doesn't work- happy to do at another Sept date but in DC and perhaps the RTP staff can join by conference call/camera. I am not in RTP that often.

I would need 30 Minutes and whatever time for Q and A to cover what is relevant for both rulemakings. And I would like to use a power point slide deck to show some NERC slides and maps.

Thank you,

Theresa Pugh

Owner

Theresa Pugh Consulting, LLC

pugh@theresapughconsulting.com

703-507-6843

www.theresapughconsulting.com

Begin forwarded message:

From: Theresa Pugh <Pugh@theresapughconsulting.com>
Date: August 23, 2018 at 5:52:52 PM EDT
To: Clint Woods <woods.clint@epa.gov>, "swanson.nicholas@epa.gov" <swanson.nicholas@epa.gov>
Cc: Amy Hambrick <hambrick.amy@epa.gov>
Subject: Request for appointment: September 17 or 18 (or 19) EPA-HQ-OAR-2017-0355

Dear Clint (and Nick),

It dawned on me that you would probably be at the AAPCA meeting in Sept or perhaps be in RTP that week. Please see the note below requesting an appointment. It is my hope to meet with you, Amy and Nick's groups together. Please scroll down.

I would make time to meet with all of you but hope your schedules make you available on Sept 17 after 2 or on Sept 18. I could make it Sept 19 if that is the only available time.

My note to Nick and Amy is below. I accidentally mis-keyed Nick's email below.

Thank you,

Theresa Pugh
Owner
Theresa Pugh Consulting, LLC
pugh@theresapughconsulting.com
703-507-6843

From: <Pugh@theresapughconsulting.com>
Date: August 23, 2018 at 4:53:43 PM EDT
To: Amy Hambrick <hambrick.amy@epa.gov>, <nick.swanson@epa.gov>
Subject: Request for appointment: September 17 or 18

Dear Amy and Nick

Good afternoon. I will be in RTP in Sept for the AAPCA meeting and wondered if there is an opportunity to meet with your staff regarding natural gas issues that are relevant for NSPS 111(d) (new ACE proposed rule) and the EPA's next steps on section OOOOa on methane for new (or existing) pipelines and compressor stations serving power sector and LDCs.

My clients are electric utilities and I have expertise with pipelines/compressor stations. I am active with NERC (unpaid advisor).

If possible, I would like to come in and see your staff (both 111d team and OOOOa) in the next month on some issues relevant to the "remaining useful life of the plant" and NERC's Nov 2017 study. I served on a NERC study in the last year as an unpaid advisor on natural gas issues. There are 23 areas in the US where more than one gas-fired power plants are served by only one pipeline with no redundancy in transmission pipelines or the underground gas storage. That places some risk for force majeure for power plants.

NERC recommends that EPA and state agencies allow for a dual fuel approval in Title V permits when voltage support or force majeure events occur- even if during ozone season. This shouldn't mean a carte blanche to run oil units or create significant new ozone problems without justification. But NERC does find 23 area (some geographically small) with electricity reliability problems - at least until more gas storage and pipelines are built. This issue is both relevant to ACE

and 111(d)). It is also important that those oil- fired or alternative fuel fired units meet all other relevant regulations including SPCC (RCRA). Many dual fuel plants in the US outside of New England have not maintained the tanks or lack sufficient footprint space to have more than 1-2 days of oil onsite.

I will be at AAPCA meeting and will request to talk to Amy and Nick's group(s)- preferably together since the issues meet for gas generators.

The link to the NERC study is

https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SPOD_11142017_Final.pdf

I look forward to seeing you- either in RTP on Sept 17-18 or via camera phone at a call in headquarters. I can easily go down to headquarters for a combination meeting. (I reached out to Wehrum earlier today asking if he could join in).

I am available on Sept. 17 at 3-5 (following a drive down from DC) or on Sept 18

Thank you,

Theresa Pugh

Owner

Theresa Pugh Consulting, LLC

pugh@theresapughconsulting.com

703-507-6843

www.theresapughconsulting.com

~ a woman owned small business~

Sent from mobile device, please excuse typos.

ADDITIONAL BACKGROUND FROM OOOOa MEETING LAST YEAR

See attachment

-----Original Appointment-----

From: Hambrick, Amy

Sent: Thursday, September 14, 2017 4:23 PM

To: Hambrick, Amy; RTP-Line-541-1595/Phone-Line/RTP-Conf-Bridge; Witosky, Matthew; Cozzie, David; Marsh, Karen; Witt, Jon; Thompson, Lisa; Garwood, Gerri; Howard, Jodi; Dewees, Jason; Macpherson, Alex; Mills, Kathy; Miller, Elizabeth; Davis, Alison; Weitz, Melissa; DeFigueiredo, Mark; Waltzer, Suzanne; Mia, Marcia; Carey, Angela

Cc: Swanson, Nicholas; Culligan, Kevin; Ayres, Sara; Lischinsky, Robert

Subject: CONFIRMED: meeting with Theresa Pugh Consulting (D201/ X4332)

When: Wednesday, September 20, 2017 1:00 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: RTP-D201-Max40/RTP-Bldg-D; RTP-OAQPS-919-541-4332-SPPD/Phone-Line/RTP-OAQPS-BLDG-C

Added presentation in email attached for those who will be calling in.

Discussion: interface between electric utilities and natural gas storage

